

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Crim. No. 13-10238-DPW
AZAMAT TAZHAYAKOV	)	
	)	
Defendant.	)	

NOTICE REGARDING GOVERNMENT'S PROPOSED  
JURY QUESTIONNAIRE

The government submits herewith is proposed jury questionnaire. The parties attempted to file a joint jury questionnaire but could not agree upon the proper scope and subject matter of the questions. The government provided the defense a 40 question questionnaire on June 3, 2014 and yesterday received the defendant's proposed 137 question questionnaire. In response, the government added 19 additional questions to its questionnaire. Many of the defendant's other proposed questions are incorporated in the government's propose questionnaire. The government, however, objects to the remaining detailed information requested by Tazhayakov that appears unnecessarily to invade the privacy of potential jurors. For instance, the government does not see the necessity of asking numerous questions regarding a potential juror's reading and television watching habits as well as their internet usage and social media activity. Nor does it believe questions should be asked that may prejudice any juror before they hear any evidence in the case or refer to the religious affiliation of the defendant, which the defendant has sought to exclude and the government does not intend to introduce.

Attached is the government's proposed questionnaire.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ B. Stephanie Siegmann  
B. STEPHANIE SIEGMANN  
JOHN A. CAPIN  
Assistant U.S. Attorneys

Certificate of Service

I do hereby certify that a copy of this notice and the government's proposed jury questionnaire was served upon counsel of record via ECF on this 13th day of June 2014.

/s/ B. Stephanie Siegmann